UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA - v. - ZHENGQUAN ZHANG, a/k/a "Zheng Quan Zhang," a/k/a "Jim Z. Zhang," Defendant.	**Affirmation in Support of Application for Order of Continuance** 17 Mag. 2467

STATE OF NEW YORK)
COUNTY OF NEW YORK) ss.:
SOUTHERN DISTRICT OF NEW YORK)

WON S. SHIN, pursuant to Title 28, United States Code, Section 1746, hereby declares under penalty of perjury:

1. I am an Assistant United States Attorney in the Office of Joon H. Kim, Acting United States Attorney for the Southern District of New York. I submit this affirmation in support of an application for an order of continuance of the time within which an indictment or information would otherwise have to be filed, pursuant to 18 U.S.C. § 3161(h)(7)(A).

2. The defendant was charged with a violation of 18 U.S.C. §§ 1832 and 2, in an amended complaint dated April 3, 2017. The defendant was arrested in the Northern District of California on April 7, 2017, and presented the same day before United States Magistrate Judge Susan van Keulen of the United

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States District Court for the Northern District of California. The defendant was ordered released upon a $100,000 personal recognizance bond and subject to certain bail conditions set by the Court.

3. The defendant was presented in this District on April 13, 2017, before United States Magistrate Judge Andrew J. Peck, and was ordered released upon a $100,000 personal recognizance bond co-signed by one financially responsible person and secured by $10,000 cash, and subject to certain bail conditions set by the Court.

4. At the presentment on April 13, 2017, the defendant's counsel, Ronald Gainor, Esq., consented to a waiver of the defendant's right pursuant to Rule 5.1 of the Federal Rules of Criminal Procedure to a preliminary hearing within 14 days of the initial appearance. Accordingly, under the Speedy Trial Act, the Government has until May 15, 2017 within which to file an indictment or information.

5. Mr. Gainor and I have had discussions regarding a possible disposition of this case, including as recently as May 5, 2017, but the negotiations have not been completed. We plan to continue our discussions, but we do not anticipate reaching a resolution before the deadline under the Speedy Trial Act expires on May 15, 2017.

6. Therefore, the Government is requesting a 30-day continuance until June 14, 2017, to continue the foregoing discussions and reach a disposition of this matter. On May 4, 2017, I communicated with defense counsel, who specifically consented to this request.

7. For the reasons stated above, the ends of justice served by the granting of the requested continuance outweigh the best interests of the public and the defendant in a speedy trial.

Dated: New York, New York
May 12, 2017

Won Shin /RAC

WON S. SHIN
Assistant United States Attorney
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